

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

May 18, 2021

KAREN MITCHELL
CLERK, U.S. DISTRICT COURT

United States of America

v.

John Kelley

Case No.

3:21-MJ-448-BT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 27, 2021 and May 17, 2021 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

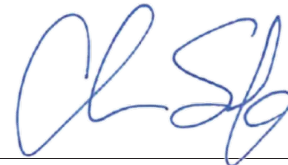
18 U.S.C. §§ 1594(a), 1591
(a) & (b)(1) and 2

Attempt to Aid and Abet Sex Trafficking

This criminal complaint is based on these facts:

Please see attached affidavit

☒ Continued on the attached sheet.



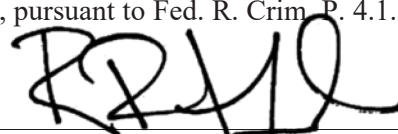
Complainant's signature

TFO Charles Self, HSI

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: May 18, 2021



Judge's signature

City and state: Dallas, Texas

REBECCA RUTHERFORD, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, Charles Self, a Task Force Officer with U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer with the Department of Homeland Security, ICE/HSI, in Dallas, Texas assigned to the North Texas Trafficking Task Force (NTTTF). I have been a Task Force Officer for approximately one year. I have received training from the Colleyville Police Department and the Department of Homeland Security. As a Task Force Officer, I have worked on multiple human trafficking investigations. As a law enforcement officer, I have used a variety of methods to investigate criminal activity including, but not limited to, visual surveillance, witness interviews and the use of search warrants.

2. In preparation for this affidavit, I have discussed the facts of this case with other law enforcement agents/officers within HSI and the NTTTF. The information contained in this affidavit is based on my personal knowledge, information I received from other law enforcement agents assisting in this investigation, and what I have learned from the other sources specifically discussed herein. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation.

3. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that between April 27, 2021, and May 17, 2021 in the Dallas Division of the Northern District of Texas and elsewhere, **John KELLEY**, committed the offense of Attempt to Aid and Abet Sex Trafficking in violation of 18 U.S.C. §§ 1594(a), 1591(a) & (b)(1) and 2.

PROBABLE CAUSE

4. Between April 27, 2021, and May 17, 2021, **KELLEY** engaged with an HSI undercover agent (UCA) representing himself as a human trafficker. **KELLEY** communicated with the UCA via social media “Website B,”¹ utilizing username “TheAlphaMajor,” and cellular telephone number 713-962-1978.²

POSITIVE IDENTIFICATION OF KELLEY

5. HSI Special Agents compared photographs from the Department of Motor Vehicles databases and confirmed that **KELLEY** is the same person whose images are featured on the social media Website B profile under the username “TheAlphaMajor.”

INITIAL POST BY UCA

6. On April 26, 2021, the UCA communicated via a public discussion post on Website B that he/she was seeking someone to “*break*” a “*slave*.”

¹ I know the name of the social media platform Website B, but in the interest of protecting ongoing investigations involving this website I do not list it here.

² Queries within electronic databases reveal that cellular telephone number 713-962-1978 is linked to **KELLEY**.

COMMUNICATIONS BETWEEN UCA AND KELLEY ON WEBSITE B

7. Communications between **KELLEY** and the UCA have been summarized and organized for clarity. All definitions and interpretations are based upon my training and experience as a law enforcement agent.

8. On April 27, 2021, **KELLEY** initiated communications with the UCA. The following is a summary of the communications conducted via a messaging application within Website B and does not include every word exchanged.

9. **KELLEY** initiated communication with the UCA when he responded to the UCA's advertisement. **KELLEY** described himself as "*an experienced Dom³ and sadist*" who would be "*happy to break in your sub⁴/slave.*" **KELLEY** explained "*I like it dark and taboo.*"

10. The UCA informed **KELLEY** that a female was refusing to engage in commercial sex under his authority and she needed to be broken. **KELLEY** suggested a physical meeting with the UCA "*to discuss details so there is no written record.*"

CELLULAR COMMUNICATIONS BETWEEN KELLEY AND THE UCA VIA A RECORDED TELEPHONE NUMBER

11. Between April 27, 2021 and April 30, 2021, **KELLEY** communicated with the UCA via text messages and telephone calls from cellular telephone number 713-962-

³ "Dom" is a common abbreviation used within the fetish community to refer to someone who identifies as a "dominant."

⁴ "Sub" is a common abbreviation used within the fetish community to refer to someone who identifies as a "submissive."

1978. The text messages and calls exchanged with **KELLEY** were over an HSI recorded telephone number. The following is a summary of the communications and does not include everything said during the exchange.

April 27, 2021 Cellular Telephone Call

12. On April 27, 2021, at approximately 7:16 p.m., **KELLEY** utilized cellular telephone number 713-962-1978 to call the UCA. The UCA confirmed **KELLEY** was the same person communicating on Website B. **KELLEY** told the UCA *“I won’t report you. Tell me what the real deal is just so I know what I’m getting into.”* The UCA told **KELLEY** he/she was the head of a human trafficking organization, and that he/she was interested in hiring a person to compel an unwilling victim to engage in commercial sex under the UCA’s authority. **KELLEY** communicated his understanding of the UCA’s request when he said, *“In your particular situation you’re looking for her to be more afraid of the punishment than she is of the work.”* **KELLEY** communicated his understanding of the difference between fetish submission and forcing someone into commercial sex when he said *“I consider that you know it’s not submission it’s oppression and what you’re talking about is oppression, which I don’t give a shit....It’s a means to an end for you. They actually do what you need them to do when they and do it when you want them to do it, as often as you want them to do it.”*

13. **KELLEY** confirmed that he would torture the victim for the purpose of compelling him/her to engage in commercial sex under the UCA’s authority when he said *“I would be happy to help you. Anonymity is going to be key...I really do not want the*

negative press or dealing with the legal ramifications.” KELLEY further confirmed that he understood the purpose of the torture when he stated, “To me whether or not you tell her to go out and make money by spreading her legs or you want her to go out and kill somebody I could care less. As long as she does what she’s told and that’s really what it comes down to.”

14. **KELLEY** detailed some of the methods he would use to force the victim into obedience. **KELLEY** stated, *“I would come up here and work every day and abuse her every night. It’s imperative she has time alone to just wallow in her own misery. Because she needs to understand that when I walk out the door she doesn’t know if it’s the last time anyone will come back. She needs to have that fear every time. Whether or not I beat her, whether or not I abuse her, whether or not I torture her I’m still her savior because I’m her only sense of hope that she is not going to die.”*

IN-PERSON MEETING BETWEEN KELLEY AND UCA

14. On April 28, 2021, **KELLEY** travelled to the Dallas/Fort Worth area to meet the UCA for an in-person meeting. Beginning at his arrival at the meeting location, **KELLEY** was under physical surveillance by members of the NTTTF. **KELLEY** entered the agreed-upon establishment and met with the UCA for approximately seventy-four (74) minutes, during which time the conversation was recorded with both audio and video.

15. During the meeting, **KELLEY** reassured the UCA of his ability to break the human trafficking victim. **KELLEY** confirmed his intent to travel to the Dallas/Fort

Worth area to torture the victim for the UCA. After the meeting, **KELLEY** travelled to a hotel located in Fort Worth, Texas, and surveillance was terminated.

Text Messages Exchanged Between April 30, 2021 and May 14, 2021

16. During text messages exchanged on April 30, 2021, the UCA and **KELLEY** confirmed a location for the torture to take place. **KELLEY** attempted to convince the UCA to arrange commercial sex dates for a woman under **KELLEY**'s control. **KELLEY** requested the UCA purchase a “burner⁵” phone to facilitate communications regarding the torture of the victim. **KELLEY** and the UCA agreed to a tentative timeline of between May 9 and May 11, 2021 for **KELLEY** to travel to the Dallas/Fort Worth area to begin the torture.

17. During text messages exchanged on May 3, 2021, **KELLEY** messaged the UCA to ask, “*How’s it going?*” **KELLEY** requested the UCA bring the victim “*bound and hooded from the start*” to create an emotional impact.

18. During text messages exchanged on May 11, 2021, **KELLEY** messaged the UCA to say, “*Just checking to see if we still moving forward.*” The UCA confirmed. **KELLEY** messaged “*Good. Let me start making some logistics stuff and we can arrange for next week. I will need to be up there a day before you bring her.*”

19. During text messages exchanged on May 14, 2021, **KELLEY** messaged the UCA, “*plan to deliver her Monday night.....I still need to get chain and locks and*

⁵ The term “burner” refers to a cellular telephone that cannot be traced back to its user.

bucket for her to piss and shit.”

ARREST OF KELLEY

20. On Monday, May 17, 2021, at approximately 8:43 p.m., HSI Special Agents observed **KELLEY** arriving at an address previously provided by the UCA. HSI Special Agents maintained surveillance as **KELLEY** parked the vehicle. At approximately 8:45 p.m., **KELLEY** was taken into custody without incident and transported to the Dallas County Jail.

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CONCLUSION

21. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that between April 27, 2021, and May 17, 2021, in the Dallas Division of the Northern District of Texas and elsewhere, John **KELLEY** committed the offense of Attempt to Aid and Abet Sex Trafficking in violation of 18 U.S.C. §§ 1594(a) 18 U.S.C. § 1591(a) & (b)(1) and 2.

Respectfully submitted,



Charles Self
Task Force Officer
Homeland Security Investigations

Agent sworn and signature confirmed via reliable electronic means on May 18, 2021, pursuant to Fed. R. Crim. P. 4.1.



REBECCA RUTHERFORD
UNITED STATES MAGISTRATE JUDGE